

REMARKS

This Application has been carefully reviewed in light of the Official Action mailed July 23, 2004. In order to advance prosecution of the present Application, Claims 1, 10, 13, and 14 have been amended. Applicant respectfully requests reconsideration and favorable action in this Application.

The drawings stand objected to under 37 C.F.R. §1.84(p)(5) as including reference numerals not mentioned in the specification. The specification has been amended to show the reference numerals provided in the drawings identified by the Examiner. Therefore, Applicant respectfully submits that the drawings are in accordance with 37 C.F.R. §1.84(p)(5).

The specification stands objected to under M.P.E.P. §608.01 as containing an embedded hyperlink or other form of browser executable code. The specification merely includes a text version of a website link for background identification purposes only that has no executable or linking capability. Therefore, Applicant respectfully submits that the specification is in accordance with M.P.E.P. §608.01.

Claims 1 and 10-12 stand provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over Claims 1 and 19 of copending U.S. Application Serial No. 09/781,522. Attached herewith is a Terminal Disclaimer to overcome this rejection.

Claims 3, 13, and 14 stand provisionally rejected under 35 U.S.C. §101 as claiming the same invention as that of Claims 9, 19, and 20 of copending U.S. Application Serial No. 09/780,755. Applicant respectfully traverses this rejection. Claim 3 of the present Application is a method claim whereas Claim 9 of copending U.S. Application Serial No. 09/781,522 is a system claim. Claim 13 of the present Application is a method claim as opposed to the system of amended Claim 19 of copending U.S. Application Serial No. 09/781,522. Claim 14 of

the present Application lacks a control block feature present in Claim 20 of copending U.S. Application Serial No. 09/781,522. Therefore, Applicant respectfully submits that Claims 3, 13, and 14 are in accordance with 35 U.S.C. §101.

Claims 1, 3, and 10-14 stand rejected under 35 U.S.C. §102(e) as being anticipated by Albert, et al. Independent Claims 1, 10, 13, and 14 recite in general the ability to allocate connection blocks within a subpool memory block where the connection blocks contain particular ones of the client NAT addresses. Also, each connection block may be either free or allocated and particular ones of the client NAT addresses remain allocated within the subpool memory until all connection blocks in the subpool memory are free. By contrast, the portions of the Albert, et al. patent identified by the Examiner are merely directed to affinity keys that determine whether a forwarding agent is to route packets to a service manager where address translation may be performed. More important, there is no disclosure in the Albert, et al. patent that discusses the allocation within a subpool of memory for connection blocks with particular client NAT addresses and the deallocation of the subpool once all of the connection blocks and client NAT addresses are free therein. The Albert, et al. patent merely mentions network address translation and provides no disclosure with respect to the allocation technique of the claimed invention. Support for the above recitation can be found at page 18, lines 1-4, of Applicant's specification. Therefore, Applicant respectfully submits that Claims 1, 3, and 10-14 are not anticipated by the Albert, et al. patent.

Applicant respectfully defers action on Claims 2 and 4-9 pending a final disposition of generic Claim 1.

CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending claims.

The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.

Attorneys for Applicants



Charles S. Fish

Reg. No. 35,870

October 21, 2004

CORRESPONDENCE ADDRESS:

2001 Ross Avenue, Suite 600

Dallas, TX 75201-2980

(214) 953-6507

Customer Number: 05073